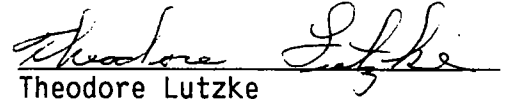


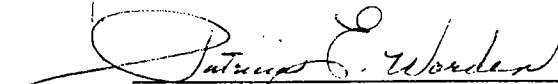


1. My name is Theodore Lutzke.
2. During the years 1947 to 1987, I was employed by Union Steel Inc., ("Union Steel") in Albion, Michigan.
3. I have personal knowledge of the following facts and could testify to them if necessary.
4. As part of my duties at Union Steel, I carried out Union Steel's wishes concerning disposal of wastes of all types, including liquid and industrial wastes.
5. All Union Steel wastes that may have been disposed of by Seiler Tank Truck Services Inc., were disposed of in sites selected by Union Steel Inc. On behalf of Union Steel, I directed Seiler Tank Truck Services, Inc. to dispose of Union Steel wastes at sites selected by Union Steel.

FURTHER AFFIANT SAYETH NOT.

  
Theodore Lutzke

Subscribed and sworn to before  
me on August 15, 1991.

  
Patricia E. Worden                      Notary Public  
Calhoun                      County, Michigan  
My Commission Expires: January 24, 1995

L2319e